

IOWA BOARD OF EDUCATIONAL EXAMINERS

Presentation and Discussion

to the

Joint Education Appropriation Committee

Thursday, January 27, 2005

**9:30 a.m.
Room 22**

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Executive Director**

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281-4810**

BUDGET SUMMARY AND RECOMMENDATIONS

ASSUMPTIONS:

- The number of BoEE Initial and Regular Licenses issued during each FY will remain constant, approximately 20,000.
- All other licenses issued by the Board will vary until data can be collected to predict a trend, approximately 5000-6000.
- The budget will be based on the revenue received for approximately 25,000 licenses per FY.
- By using historical data, we can establish trends that will more predictive of actual revenue.
- By maintaining current staff, we will maintain the level of service.
- Only minimal adjustments can be made to the FY '05 budget without reducing the level of service.
- Changes will need to be made in the budgeting process.
- Iowa Code 272.10 states, "It is the intent of the general assembly that licensing fees established by the board of educational examiners be sufficient to finance the activities of the board under this chapter."

FACTS:

- A longitudinal study was needed to determine the trends in the number of licenses issued per year, expenditures, and revenues.
- Rationale for projected deficit in FY '05
 - The Board's expenditures have exceeded revenues over the past three (3) years. (FY's '02, '03, '04)
 - Loss of appropriation (approximately \$40,000)
 - The number of licenses issued to date do not meet budget expectations (2,000 licenses or approximately \$125,000)
- FY 04 revenue seems to be an anomaly.
- BoEE staff has stayed constant for the last five (5) years even while responsibilities for the Board have increased, such as: background checks, teacher intern, substitute authorization, para educator license, and behind-the-wheel drivers license.
- Approximately \$280,000 per year is spent by the Department of Education for additional staff to do BoEE activities.
- The General Fund appropriation has declined from \$200,000 in 1998 to \$0 in 2005, with no increase in fees until this year.
- Board has relied on carryover and increases in the number of licenses issued to maintain budget increases.

- The current level of funding does not permit the Board the opportunity to obtain technology that will provide for a more effective and efficient licensing system.
- Budget increases have been due to changes in salaries and benefits.
- The Board does not have sufficient cash flow to pay bills from month-to-month.
- The \$10 application fee increase will not cover the loss of revenue for this year or the loss of the appropriation.
- Level of service:
 - A new in-state applicant's license will be processed and mailed within approximately one (1) week from the time the Board receives it.
 - A new out-of-state applicant's license will be processed and mailed within approximately three (3) weeks if all the documents requested are submitted.
 - Renewals take about three (3) weeks from the time we receive the application.
 - In the future, on-line application should reduce the turn-around time.

RECOMMENDATIONS:

- The BoEE shall retain all fees collected. It would seem a natural progression for the Board to maintain all fees since the appropriation has been reduced from \$200,000 to \$0 over the last several years.
- The BoEE shall assume financial responsibility for all staff from the Department.
- **To sufficiently finance the activities of the Board and to be accountable for the actual costs of all board activities, I would recommend that Iowa Code 272.10 be amended to read, "That the board of educational examiners retain all fees collected during the fiscal year. Any fees remaining unexpended on June 30 of each fiscal year will carry forward to the next year not to exceed 10% of the total collections for that year. All fees in excess of the ten percent (10%) carried forward will be deposited into the general fund of the state."**

Budget Recommendation for FY '06 through FY '10.

Budget Recommendation is based on:

- the BoEE retaining all fees collected.
- Department Staff supporting the BoEE are part of the BoEE's Budget.

Projected Revenue and Expenditures with BoEE retaining all fees.

	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10
Resources:						
Balance Forward	\$ -	\$ (178,651)	\$ (103,385)	\$ (60,264)	\$ (45,117)	\$ (54,247)
Appropriations	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Receipts						
Salary adj	\$ -					
Fees, Lic. & Permits	\$ 539,880	\$ 1,115,353	\$ 1,114,410	\$ 1,118,576	\$ 1,127,401	\$ 1,123,292
Other	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Total Resources:	\$ 833,880	\$ 1,409,353	\$ 1,408,410	\$ 1,412,576	\$ 1,421,401	\$ 1,417,292
Expenditures:						
General Office	\$ 718,531	\$ 1,040,087	\$ 1,071,290	\$ 1,103,428	\$ 1,136,531	\$ 1,170,627
DCI/FCI Bkgd checks	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Expenditure Subtotal	\$ 1,012,531	\$ 1,334,087	\$ 1,365,290	\$ 1,397,428	\$ 1,430,531	\$ 1,464,627
Resources minus Expend =	\$ (178,651)	\$ 75,266	\$ 43,120	\$ 15,148	\$ (9,130)	\$ (47,335)
Budget adjustment:			\$ -	\$ -	\$ -	
Carry Forward	\$ (178,651)	\$ (103,385)	\$ (60,264)	\$ (45,117)	\$ (54,247)	\$ (101,582)

FTE Positions

FTE Budgeted	8.00	8.00	8.00	8.00	8.00	8.00
FTE Used	6.73	6.73	6.73	6.73	6.73	6.73
Department Staff included with BoEE staff	5.00	5.00	5.00	5.00	5.00	5.00

Note: Budget increase for 06 forward at 3%
Past Budget increases have been from 4 to 12%

FY 2004 Actual Revenue by month

	July	August	September	October	November	December	January	February	March	April	May	June	Total
Emerg. Lic	\$ 1,950	\$ 3,250	\$ 3,350	\$ 2,100	\$ 2,450	\$ 2,250	\$ 2,750	\$ 3,075	\$ 2,600	\$ 3,000	\$ 1,250	\$ 1,950	\$ 29,975
Regular Lic	\$ 109,729	\$ 107,331	\$ 83,565	\$ 85,939	\$ 56,726	\$ 56,387	\$ 69,278	\$ 58,219	\$ 121,224	\$ 83,066	\$ 78,814	\$ 109,729	\$ 1,020,006
Eval Fee	\$ 4,400	\$ 7,258	\$ 5,150	\$ 3,375	\$ 1,705	\$ 2,050	\$ 3,300	\$ 2,750	\$ 3,355	\$ 2,800	\$ 3,650	\$ 4,400	\$ 44,193
Duplicate Lic	\$ 560	\$ 660	\$ 590	\$ 580	\$ 260	\$ 300	\$ 630	\$ 480	\$ 580	\$ 510	\$ 530	\$ 560	\$ 6,240
Endorsement	\$ 6,935	\$ 5,800	\$ 4,575	\$ 2,575	\$ 2,025	\$ 2,350	\$ 4,600	\$ 3,925	\$ 3,825	\$ 3,540	\$ 4,050	\$ 6,935	\$ 51,135
Teacher Intern	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Substitute Auth	\$ 750	\$ 883	\$ 1,875	\$ 2,350	\$ 1,225	\$ 1,200	\$ 875	\$ 2,192	\$ 1,475	\$ 1,375	\$ 1,400	\$ 750	\$ 16,350
Para License	\$ 3,361	\$ 4,280	\$ 3,360	\$ 1,955	\$ 1,675	\$ 3,460	\$ 720	\$ 750	\$ 1,858	\$ 1,785	\$ 4,505	\$ 3,361	\$ 31,070
Coach Ext	\$ 250	\$ 370	\$ 340	\$ 240	\$ 260	\$ 220	\$ 180	\$ 160	\$ 340	\$ 90	\$ 220	\$ 250	\$ 2,920
BTW License	\$ 80	\$ 30	\$ 20	\$ 10	\$ 20	\$ 190	\$ 190	\$ 130	\$ 110	\$ 60	\$ 70	\$ 80	\$ 990
DCIck	\$ 4,319	\$ 5,368	\$ 5,072	\$ 9,332	\$ 5,095	\$ 4,635	\$ 3,458	\$ 2,946	\$ 14,062	\$ 6,170	\$ 6,142	\$ 4,319	\$ 70,919
FBI CK	\$ 10,366	\$ 12,883	\$ 12,173	\$ 22,372	\$ 12,227	\$ 11,125	\$ 8,300	\$ 7,071	\$ 33,749	\$ 14,809	\$ 14,741	\$ 10,366	\$ 170,183
ITD	\$ 864	\$ 1,074	\$ 1,014	\$ 1,864	\$ 1,019	\$ 927	\$ 692	\$ 589	\$ 2,812	\$ 1,234	\$ 1,228	\$ 864	\$ 14,182
BoEE Bkgd	\$ 2,592	\$ 3,221	\$ 3,043	\$ 5,593	\$ 3,057	\$ 2,781	\$ 2,075	\$ 1,768	\$ 8,437	\$ 3,702	\$ 3,685	\$ 2,592	\$ 42,546
Fine	\$ 4,720	\$ 5,525	\$ 3,450	\$ 2,100	\$ 2,975	\$ 3,500	\$ 4,700	\$ 5,050	\$ 4,310	\$ 5,700	\$ 3,600	\$ 4,720	\$ 50,350
Grand Total	\$ 150,876	\$ 157,931	\$ 127,578	\$ 140,385	\$ 90,719	\$ 91,375	\$ 101,748	\$ 89,106	\$ 198,738	\$ 127,842	\$ 123,885	\$ 150,876	\$ 1,551,059
DCI-FBI Total	\$ 15,549	\$ 19,324	\$ 18,260	\$ 33,568	\$ 18,341	\$ 16,687	\$ 12,450	\$ 10,607	\$ 50,624	\$ 22,214	\$ 22,111	\$ 15,549	\$ 255,284
BoEE Total	\$ 59,950	\$ 63,007	\$ 50,110	\$ 50,347	\$ 34,274	\$ 35,985	\$ 40,727	\$ 36,230	\$ 69,614	\$ 49,346	\$ 47,815	\$ 59,950	\$ 597,355
GenFund Total	\$ 75,377	\$ 75,600	\$ 59,208	\$ 56,470	\$ 38,104	\$ 38,703	\$ 48,571	\$ 42,269	\$ 78,500	\$ 56,283	\$ 53,960	\$ 75,377	\$ 698,420

FY 2005 Year-to-date Revenues

	July	August	September	October	November	December	January	February	March	April	May	June	Total
Emerg. Lic	\$ 1,575	\$ 3,550	\$ 2,330	\$ 1,750	\$ 2,965	\$ 1,650							\$ 13,820
Initial Lic			\$ 14,309	\$ 44,440	\$ 24,323	\$ 17,182							\$ 100,254
Regular Lic	\$ 96,372	\$ 121,293	\$ 54,244	\$ 41,289	\$ 39,616	\$ 40,442							\$ 393,256
Eval Fee	\$ 7,100	\$ 6,230	\$ 4,915	\$ 2,725	\$ 2,570	\$ 2,340							\$ 25,880
Duplicate Lic	\$ 530	\$ 730	\$ 530	\$ 430	\$ 330	\$ 330							\$ 2,880
Endorsement	\$ 6,065	\$ 9,500	\$ 6,795	\$ 4,670	\$ 3,255	\$ 5,378							\$ 35,663
Teacher Intern	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -							\$ -
Substitute Auth	\$ 1,025	\$ 3,110	\$ 2,050	\$ 2,335	\$ 1,518	\$ 1,457							\$ 11,495
Para License	\$ 2,440	\$ 4,450	\$ 1,320	\$ 735	\$ 560	\$ 635							\$ 10,140
Coach Ext	\$ 250	\$ 530	\$ 405	\$ 485	\$ 600	\$ 350							\$ 2,620
BTW License	\$ 30	\$ 10	\$ -	\$ -	\$ 100	\$ 400							\$ 540
DCIck	\$ 3,707	\$ 4,959	\$ 3,147	\$ 8,627	\$ 4,281	\$ 2,919							\$ 27,639
FBI CK	\$ 8,897	\$ 11,895	\$ 7,528	\$ 20,705	\$ 10,274	\$ 7,005							\$ 66,303
ITD	\$ 741	\$ 991	\$ 629	\$ 1,725	\$ 856	\$ 584							\$ 5,527
BoEE Bkgd	\$ 2,224	\$ 2,974	\$ 1,882	\$ 5,176	\$ 2,568	\$ 1,751							\$ 16,576
Fine	\$ 4,950	\$ 7,650	\$ 3,920	\$ 3,330	\$ 4,220	\$ 3,170							\$ 27,240
													\$ -
Grand Total	\$ 135,906	\$ 177,873	\$ 104,004	\$ 138,422	\$ 98,036	\$ 85,593	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 739,834
													\$ -
DCI-FBI Total	\$ 13,345	\$ 17,846	\$ 11,304	\$ 31,057	\$ 15,411	\$ 10,508	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 99,470
													\$ -
BoEE Total	\$ 54,485	\$ 73,073	\$ 46,043	\$ 53,252	\$ 41,356	\$ 37,054							\$ 305,264
GenFund Total													\$ -
Gen Fund Tota	\$ 68,076	\$ 86,954	\$ 46,656	\$ 54,113	\$ 41,269	\$ 38,031	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 335,100

Number of Licenses Issued by Category

	2000 Actual	2001 Actual	2002 Actual	2003 Actual	2004 Actual	2005 Projected	2006 Projected	2007 Projected	2008 Projected	2009 Projected	2010 Projected
Emerg. Lic	266	200	194	205	273	225	227	221	224	229	233
Initial Lic	5,825	4,853	4,072	4,141	4,329	4,200	4,570	4,361	4,279	4,313	4,342
Regular Lic	14,523	14,934	15,193	16,543	16,026	16,000	15,537	15,705	15,834	15,941	15,840
Eval Fee	0	0	0	1,345	918	900	900	900	900	900	900
Duplicate Lic	0	0	0	532	612	550	550	550	550	550	550
Endorsement	0	0	0	1,628	3,440	2,500	2,500	2,500	2,500	2,500	2,500
Teacher Intern	0	0	0	0	0	0	0	0	0	0	0
Substitute Auth	0	0	0	352	602	400	400	400	400	400	400
Para License	1	46	207	558	1,195	750	750	750	750	750	750
Coach Ext	98	226	194	266	289	225	225	225	225	225	225
BTW License	10	34	53	77	90	70	56	63	68	71	70
	20,723	20,293	19,913	25,647	27,774	25,820	25,714	25,675	25,730	25,879	25,810
Background check						7,000	7,000	7,000	7,000	7,000	7,000

Projected Revunue based on the Projected Number of Licenses Issued

Emergency License	\$	125	Add Endorsement	\$	50	BTW License	\$	25
Initial License	\$	50	Teacher Intern	\$	100	Background Check	\$	42
Regular License	\$	60	Substitute Auth.	\$	25			
Evaluation Fee	\$	60	Paraprofessional Lic	\$	25			
Duplicate License	\$	10	Coaching extension	\$	25			

	2005	2006	2007	2008	2009	2010
Emerg. Lic	\$ 28,125	\$ 28,396	\$ 27,587	\$ 28,018	\$ 28,646	\$ 29,149
Initial Lic	\$ 210,000	\$ 228,500	\$ 218,042	\$ 213,940	\$ 215,664	\$ 217,099
Regular Lic	\$ 960,000	\$ 932,190	\$ 942,325	\$ 950,039	\$ 956,449	\$ 950,427
Eval Fee	\$ 54,000	\$ 54,000	\$ 54,000	\$ 54,000	\$ 54,000	\$ 54,000
Duplicate Lic	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500	\$ 5,500
Endorsement	\$ 125,000	\$ 125,000	\$ 125,000	\$ 125,000	\$ 125,000	\$ 125,000
Teacher Intern	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Substitute Auth	\$ 10,000	\$ 10,000	\$ 10,000	\$ 10,000	\$ 10,000	\$ 10,000
Para License	\$ 18,750	\$ 18,750	\$ 18,750	\$ 18,750	\$ 18,750	\$ 18,750
Coach Ext	\$ 5,625	\$ 5,625	\$ 5,625	\$ 5,625	\$ 5,625	\$ 5,625
BTW License	\$ 1,750	\$ 1,392	\$ 1,582	\$ 1,704	\$ 1,767	\$ 1,741
Bkgd check	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Grand Total	\$ 1,418,750	\$ 1,409,353	\$ 1,408,410	\$ 1,412,576	\$ 1,421,401	\$ 1,417,292
Bkgd check	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
BoEE Total	\$ 539,880	\$ 535,369	\$ 534,917	\$ 536,917	\$ 541,152	\$ 539,180
GenFund Total	\$ 584,870	\$ 579,983	\$ 579,493	\$ 581,660	\$ 586,248	\$ 584,112

Projected Revenue and Expenditures for the next 5 years based on the current funding formula

	FY 2001-02	FY 2002-03	FY 2003-04	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10
Resources:									
Balance Forward	\$ 93,336	\$ 50,273	\$ 34,116	\$ 0	\$ (178,651)	\$ (383,369)	\$ (610,741)	\$ (858,982)	\$ (1,126,543)
Appropriations	\$ 42,975	\$ 41,688	\$ 40,974	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Receipts									
Salary adj		\$ 1,014	\$ -	\$ -					
Fees, Lic. & Permits	\$ 521,239	\$ 567,778	\$ 594,865	\$ 539,880	\$ 535,369	\$ 534,917	\$ 536,917	\$ 541,152	\$ 539,180
Other	\$ 218,718	\$ 230,206	\$ 251,694	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Total Resources:	\$ 782,932	\$ 840,686	\$ 887,533	\$ 833,880	\$ 829,369	\$ 828,917	\$ 830,917	\$ 835,152	\$ 833,180
Expenditures:									
General Office	\$ 556,843	\$ 581,434	\$ 648,004	\$ 718,531	\$ 740,087	\$ 762,290	\$ 785,158	\$ 808,713	\$ 832,974
DCI/FBI Bkgd checks	\$ 269,152	\$ 275,409	\$ 273,644	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Expenditure Subtotal	\$ 825,995	\$ 856,843	\$ 921,648	\$ 1,012,531	\$ 1,034,087	\$ 1,056,290	\$ 1,079,158	\$ 1,102,713	\$ 1,126,974
Resources minus Expend =	\$ (43,063)	\$ (16,157)	\$ (34,115)	\$ (178,651)	\$ (204,718)	\$ (227,373)	\$ (248,241)	\$ (267,561)	\$ (293,794)
Carry Forward	\$ 50,273	\$ 34,116	\$ 0	\$ (178,651)	\$ (383,369)	\$ (610,741)	\$ (858,982)	\$ (1,126,543)	\$ (1,420,338)

Projected Revenue and Expenditures for the next 5 years based Board retaining all fees and assuming responsibility for Department staff assigned to the Board

	FY 2001-02	FY 2002-03	FY 2003-04	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10
Resources:									
Balance Forward	\$ 93,336	\$ 50,273	\$ 34,116	\$ 0	\$ (178,651)	\$ (103,385)	\$ (60,264)	\$ (45,116)	\$ (54,246)
Appropriations	\$ 42,975	\$ 41,688	\$ 40,974	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Receipts									
Salary adj		\$ 1,014	\$ -	\$ -					
Fees, Lic. & Permits	\$ 521,239	\$ 567,778	\$ 594,865	\$ 539,880	\$ 1,115,353	\$ 1,114,410	\$ 1,118,576	\$ 1,127,401	\$ 1,123,292
Other	\$ 218,718	\$ 230,206	\$ 251,694	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Total Resources:	\$ 782,932	\$ 840,686	\$ 887,533	\$ 833,880	\$ 1,409,353	\$ 1,408,410	\$ 1,412,576	\$ 1,421,401	\$ 1,417,292

Expenditures:									
General Office	\$ 556,843	\$ 581,434	\$ 648,004	\$ 718,531	\$ 1,040,087	\$ 1,071,290	\$ 1,103,428	\$ 1,136,531	\$ 1,170,627
DCI/FBI Bkgd checks	\$ 269,152	\$ 275,409	\$ 273,644	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Expenditure Subtotal	\$ 825,995	\$ 856,843	\$ 921,648	\$ 1,012,531	\$ 1,334,087	\$ 1,365,290	\$ 1,397,428	\$ 1,430,531	\$ 1,464,627
Resources minus Expend =	\$ (43,063)	\$ (16,157)	\$ (34,115)	\$ (178,651)	\$ 75,266	\$ 43,120	\$ 15,148	\$ (9,130)	\$ (47,335)
Carry Forward	\$ 50,273	\$ 34,116	\$ 0	\$ (178,651)	\$ (103,385)	\$ (60,264)	\$ (45,116)	\$ (54,246)	\$ (101,581)

FTE Positions									
FTE Budgeted	9.00	7.00	7.00	8.00	8.00	8.00	8.00	8.00	8.00
FTE Used	6.36	6.53	6.73	6.73	6.73	6.73	6.73	6.73	6.73
Department Staff included with BoEE staff					5.00	5.00	5.00	5.00	5.00

Note: Budget increase for 06 forward at 3%

Past Budget increases have been from 4 to 12%

Projected Revenue and Expenditures with BoEE retaining all fees.

	FY 2004-05	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09	FY 2009-10
Resources:						
Balance Forward	\$ -	\$ (178,651)	\$ (103,385)	\$ (60,264)	\$ (45,117)	\$ (54,247)
Appropriations	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Receipts						
Salary adj	\$ -					
Fees, Lic. & Permits	\$ 539,880	\$ 1,115,353	\$ 1,114,410	\$ 1,118,576	\$ 1,127,401	\$ 1,123,292
Other	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Total Resources:	\$ 833,880	\$ 1,409,353	\$ 1,408,410	\$ 1,412,576	\$ 1,421,401	\$ 1,417,292

Expenditures:						
General Office	\$ 718,531	\$ 1,040,087	\$ 1,071,290	\$ 1,103,428	\$ 1,136,531	\$ 1,170,627
DCI/FBI Bkgd checks	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000	\$ 294,000
Expenditure Subtotal	\$ 1,012,531	\$ 1,334,087	\$ 1,365,290	\$ 1,397,428	\$ 1,430,531	\$ 1,464,627
Resources minus Expend =	\$ (178,651)	\$ 75,266	\$ 43,120	\$ 15,148	\$ (9,130)	\$ (47,335)
Budget adjustment:			\$ -	\$ -	\$ -	
Carry Forward	\$ (178,651)	\$ (103,385)	\$ (60,264)	\$ (45,117)	\$ (54,247)	\$ (101,582)

FTE Positions						
FTE Budgeted	8.00	8.00	8.00	8.00	8.00	8.00
FTE Used	6.73	6.73	6.73	6.73	6.73	6.73
Department Staff included with BoEE		5.00	5.00	5.00	5.00	5.00

Note: Budget increase for 06 forward at 3%
Past Budget increases have been from 4 to 12%